

## EXHIBIT B

***AB Litigation Services***

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF WYOMING

Civil Action No. 1:22-CV-00155-KHR

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VIDEOCONFERENCE DEPOSITION OF CHARLES R. CIANCANELLI  
November 29, 2023  
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MO POW 3, LLC and MO POW 4, LLC,

Plaintiffs,

vs.

CRYPTO INFINITI LLC,

Defendant.  
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**APPEARANCES:**

HATHAWAY & KUNZ, LLP

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Appearing via videoconference on  
behalf of Plaintiffs.

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Appearing via videoconference on  
behalf of Defendant.

*AB Litigation Services*

1 Q The physical development side.

2 A So physically, no.

3 Q No, as in there had been no physical  
4 development?

5 A No.

6 Q What about the current status of the site?  
7 Do you have any knowledge of anything being built  
8 out physically at that site?

9 A No knowledge.

10 Q And in your experience and, you know, in  
11 the construction industry, why couldn't that site,  
12 400 North Main, Springfield, Missouri, have provided  
13 the full 35 megawatts, do you know?

14 A There's substations that provide the load  
15 for the power, electricity, and that was -- that  
16 site was only able to provide a load for whatever  
17 the utility companies would tell us for. I believe  
18 that was a 15-megawatt site that they were able to  
19 provide a load for.

20 Q Okay. Let me turn to another site. 5501  
21 East Farm Road 112, Strafford, Missouri. That  
22 address ring a bell?

23 A Yes.

24 Q Okay. Let's walk through that site, and  
25 tell me what you know about it.